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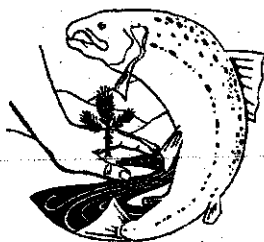
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June 9, 2009

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Sent via email: commentletters@waterboards.ca.gov

Re: Comment Letter – ARRA Subsidy

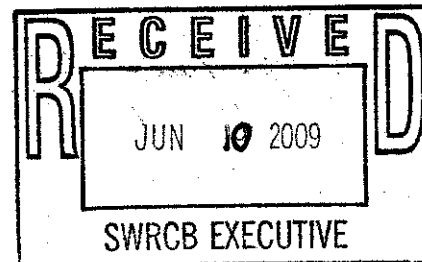
Honorable Board Members:

I am writing to express concern over your staff's recommendation to allocate federal stimulus funds with priority given to urban wastewater projects. This decision is not congruent with American Recovery and Reinvestment Act and Clean Water State Revolving Fund (CWSRF) guidelines, and fails to acknowledge the importance of the benefits of Expanded Use projects in disadvantaged rural areas.

Page two of the American Recovery and Reinvestment Act (ARRA) states that one of the major purposes of ARRA is "to assist those most impacted by the recession." State Water Board staff have chosen to measure this impact via unemployment rates (page 2 of "Notice of Opportunity to Comment"), coming to the incorrect conclusion that the highest unemployment rates for submitted project areas are urban. Submitted project information (from the FFAST website) combined with county unemployment statistics show that the highest unemployment rates are not located near urban wastewater projects, but rather around Forestry and Agriculture projects more of which are located in rural counties.

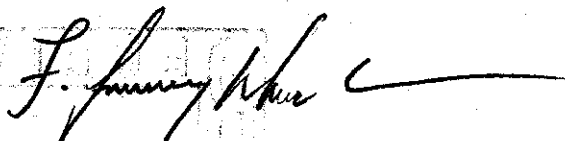
For example, our rural county of Humboldt had an unemployment rate of 11.6% in April of 2009, while Los Angeles County's rate for the same month was 10.3%. By choosing to give project priority to urban areas, a large percentage of projects located in areas that have been most impacted by the recession are not being considered. Based on this information, we respectfully request that urban projects receive no higher priority than other disadvantaged communities.

Secondly, many projects located in disadvantaged urban areas will most likely require outside contractors to complete work. This will result in monies being funneled to contractors outside the project area rather than back into disadvantaged communities. In our rural county, however, contractors live in the same area of proposed project sites, assuring that funds are indeed reaching those with the greatest need.



Lastly, *The Policy for Implementing the Clean Water State Revolving Fund* states that the "...purpose of the CWSRF Program is to implement the CWA...by assisting in the financing of wastewater treatment facilities... **correct nonpoint source and storm drainage pollution problems** [emphasis added]..." Nowhere does this policy give priority for any one project type over another. We are therefore asking that the Water Board stay true to SWRCB and ARRA policy by funding projects of all types based on their own merits, rather than an arbitrary—and ultimately political—prioritization of urban wastewater projects.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Jeremy Wheeler", followed by a long horizontal flourish.

F. Jeremy Wheeler
Executive Director